



**CONESTOGA-ROVERS
& ASSOCIATES**

EPA Region 5 Records Ctr.

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Telephone 519 884 0510 Facsimile 519 884-0525

September 26, 2003

Reference No 33774

EPA Region 5 Records Ctr.



203892

Ms. Eileen L. Furey
Associate Regional Counsel
United States Environmental Protection Agency C-14J
77 W. Jackson Boulevard
Chicago, IL 60604

Dear Ms. Furey:

Re: General Motors Corporation Response
104(e) Request for Information
Allied Paper/Portage Creek/Kalamazoo River Superfund Site
Kalamazoo and Allegan Counties, Michigan

Enclosed please find General Motors Corporation's (GM's) response to the United States Environmental Protection Agency's 104(e) Request for Information for the Allied Paper/Portage Creek/Kalamazoo River Superfund Site, dated June 26, 2003. Conestoga-Rovers & Associates, Inc. (CRA) has prepared this response on behalf of GM.

As identified in the attached response, GM does not have any information or data to suggest that polychlorinated biphenyls (PCBs) were detected in the wastewater discharged to the local wastewater reclamation plant from its facility located at 5200 East Cork Street in Kalamazoo, Michigan

Should you have any questions with respect to the enclosed, please contact Ms. Linda Bentley with GM Legal Staff at (313) 665-4883 or via email at linda.l.bentley@gm.com.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

Jeanne Piercey
Jeanne Piercey, M.A.Sc., PE

lw/JP/1
Encl.

c.c.: Linda Bentley

REGISTERED COMPANY

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Worldwide Engineering, Environmental, Construction, and IT Services



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& ASSOCIATES

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List of Attachments

Attachment A	Historical Ownership Summary (1960-1967)
Attachment B	Decommissioning Analytical Data
Attachment C	1991 Waterflow Diagram
Attachment D	Wastewater Analytical Data (1996)
Attachment E	B-O-C Kalamazoo Plant Sewer System Site Map
Attachment F	Locations of PAOCs and PAORs
Attachment G	Site Location Map
Attachment H	PCB Analytical Data (1999)
Attachment I	Baseline Environmental Assessment Analytical Data

Certification Statement

September 26, 2003

I, Linda L. Bentley, am employed as a legal assistant by General Motors Corporation and in that capacity certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted.

Based upon my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Submitted by



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- 1. Identify all persons consulted in the preparation of your responses to these Information Requests.**

Conestoga-Rovers & Associates (CRA), consultant who performed several investigations at the Site, was consulted for information.

Fred Rindhage, Remediation Team, General Motors Corporation, Troy, MI

Linda L. Bentley, Legal Assistant, General Motors Corporation, Detroit, MI

- 2. Identify all documents consulted, examined, or referred to in the preparation of your responses to these Information Requests, and provide copies of all such documents. If, in lieu of or along with a textual response to any specific Request, you refer to a document that you believe contains information responsive to that Request, you must identify the specific location (page number, paragraph number) in the document where responsive information can be located.**

The following list contains all documents consulted, examined, or referred to in the preparation of the response to U.S. EPA's information request:

Sewer System Site Map, Environmental Facilities Engineering, October 1989;
1991 Waterflow Diagram, Environmental Facilities Engineering, April 1992;
GM's SPCC and PIPP, Earth Tech, Inc., December 1995;
KAR Laboratories, Inc Data, September and October, 1996;
Phase I Environmental Site Assessment, CRA, March 1999;
Building Decommissioning Assessment Report, CRA, June 1999;
ACM Survey Report, CRA, June 1999;
Phase II Environmental Site Investigation, CRA, June 1999;
Martin Environmental Inc. Data, September 1999;
Action Plan for Sale of the GM Corporation Metal Fabricating Division, CRA, 1999;
Supplemental Phase II Environmental Site Investigation, CRA, October 1999;
Building Decommissioning Activities Report, CRA, October 1999;
Interim Soil Response Activities Report, CRA, October 1999; and
Draft Baseline Environmental Assessment (BEA), IT, December 1999.

In addition, a number of other historic reports by other consultants had been previously reviewed as part of the preparation of the above listed reports.

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3. **If you have reason to believe that there may be any person able to provide a more detailed or complete response to any Information Request, or who may be able to provide additional responsive documents, identify any and all such persons.**

Response to Question #3 was provided by Linda L. Bentley, Legal Assistant, GM.

GM sold this facility in 1999. We have not yet been able to contact retired employees who might have relevant knowledge due to their traveling out of state. Our response will be updated, if necessary.

4. Identify:

- (a) the address of the facility;**
- (b) past and present EPA ID numbers, RCRA numbers, and NPDES numbers for the facility; and**
- (c) the current owner of the facility.**

Response to Question #4 was obtained from the Phase I Environmental Site Assessment (CRA, Murch 1999), Building Decommissioning Assessment Report (CRA, June 1999), and Phase II Site Investigation (CRA, June 1999).

- (a) The Facility address is located at 5200 East Cork Street, Kalamazoo, Michigan, 49001.
- (b) The U.S. EPA ID Number for the Site was MID 001876663, which is now closed.

No RCRA numbers could be found. The Site submitted a RCRA Part A Permit Application in 1981. The Michigan Department of Environmental Quality (MDEQ) and U.S. EPA were contacted regarding the status of the Part A Permit Application in 1999 as part of Phase I ESA. The MDEQ indicated that they had no record of a Part A Permit Application or any other information regarding hazardous waste activities or corrective action at the Site, with the exception of a large quantity generator status. The U.S. EPA indicated that they had no information in their files regarding the Site. However, information was available in the U.S. EPA Region 5 database regarding the Site. Information in the U.S. EPA Region 5 database identified that the Site had received an interim status for a drum pad, which was subsequently clean-closed in 1984.

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A letter, dated November 7, 1983, from the GM plant manager to U.S. EPA Region 5, indicated that the Part A Permit was requested to be withdrawn and certified that hazardous wastes were not being stored for greater than 90 days. The RCRA general identification number was closed in 1999.

Stormwater generated at the Site consisted of precipitation, run-off from the building roof and hard surface areas, fire protection test water, and groundwater from the foundation drainage system. Stormwater discharged through the stormwater retention pond to Davis Creek. The NPDES Permit and a Certificate of Coverage (COC) numbers for the Site were MIR000000 and MIR20P004, respectively. The NPDES permit was issued by the MDEQ on February 15, 1994 and expired on January 31, 1999. There were no specific monitoring requirements identified in the NPDES permit or COC.

The Facility also maintained a wastewater discharge permit from the City of Kalamazoo, which was issued on March 14, 1994 and expired on March 31, 1999. The wastewater permit required semi-annual monitoring at four outfall locations for petroleum hydrocarbons and mercury. The Site never received a notice of violation for wastewater discharges to the City of Kalamazoo. According to Site personnel at the time of Phase I ESA, the Site had obtained a new wastewater discharge permit to cover the Site after March 31, 1999.

The Site operated several operations which had significant air emissions including painting operations, Safety Kleen parts cleaners, adhesive coating operations, welding, and grinding. All of these emissions were permitted by the MDEQ, as necessary. In December 1997 the Site submitted a 208a Initial Registration-Limiting potential to Emit based on actual emissions to the MDEQ in order to remove the Site from the Michigan Renewable Operating Permit Program Requirements (Title V). The application was approved by the MDEQ in February 1998. Therefore, permits for the emissions sources were no longer required.

- (c) The current facility owner is 5200 East Cork Street Investors, LLC (Hackman Capital Partners LLC).

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5. Identify all prior owners and operators of the facility, and their dates of ownership and/or operation.

Response to Question #5 was obtained from the Phase I Environmental Site Assessment (CRA, March 1999) and the BEA (IT, 1999).

GM purchased the Site in 1964 by numerous purchases of individual tracts of land. A summary of the previous owners is presented in Attachment A. Prior to GM purchasing the Site, it was operated as an agricultural property and was used for growing various crops. GM developed the Site in 1965. GM constructed the main manufacturing building in 1965, and the Site has been used for the fabrication of metal parts for vehicles throughout GM's ownership of the property. GM closed the plant in July 1999, and sold the property, including buildings and certain manufacturing equipment, in December 1999.

5200 East Cork Street Investors, LLC (Hackman Capital Partners LLC) bought the property in December 1999. According to the Draft BEA, 5200 East Cork Investors, LLC intended to lease or sell the property in the future, but had not identified any prospective leasees or purchasers at the time. It was planned that the presses and associated equipment would be used for demonstration purposes until the equipment was sold or a tenant was retained to operate the presses.

6. Provide copies of all local, state, and federal environmental permits ever granted for the facility or any part thereof (e.g., RCRA permits, NPDES permits, etc.).

No copies of environmental permits were found.

7. Identify and describe all types of monitoring reports, monitoring data, and documentation sent to or received by federal or state regulatory authorities regarding any materials containing hazardous substances used, generated, stored, treated or disposed at or from the facility.

Response to Question #7 was obtained from GM's SPCC and PIPP (Earth Tech, Inc., December 1995) and the Phase I Environmental Site Assessment (CRA, March 1999).

The Site submitted a Notification of Hazardous Waste Activity (Part A Permit) to the USEPA in October 1981.

A 1,000 gallon steel gasoline Underground Storage Tank (UST) was removed in 1990, and replaced by an aboveground storage tank (AST). The UST was reported as a Leaking Underground Storage Tank (LUST). The release was investigated and a closure report was prepared by WW Engineering Science and was submitted to the Michigan

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Department of Natural Resources (MDNR) (now the MDEQ) in May 1991. This closure report was denied by the MDNR. Additional soil and groundwater samples were collected and analyzed and a closure report was prepared by Dell Engineering in September 1996.

According to Site personnel and based on information reviewed, the Site made notifications under Section 312 and 313 of Emergency Planning and Community Right to Know Act (EPCRA) and toxic chemical release reporting.

The Site filed hazardous chemical inventory reports, Tier Two reports, for seven chemicals (280 degreaser, draw 58B, liquid argon, Morton Safe-T-Salt, sulfuric acid, Uniseal 162.6, and Vacrex 7315) for reporting year 1997.

The Site filed a Toxic Chemical Release Inventory (TRI), Form R for two chemicals (barium and glycol ether) for reporting year 1997. The Site was identified by the environmental database search to be listed on the 1994 TRI Report.

In December 1997, the Site submitted a 208a Initial Registration-Limiting potential to Emit based on actual emissions to the MDEQ in order to remove the Site from the Michigan Renewable Operating Permit Program Requirements (Title V). The application was approved by the MDEQ in February 1998. Therefore, permits for the emissions sources were no longer required.

In addition, there have been several reportable spills/releases at the Site. Information regarding spills/releases at the Site, if any, prior to 1986 was not available. Reported spills/releases since 1986 are outlined below:

<u><i>Date Affected</i></u>	<u><i>Description</i></u>	<u><i>Location</i></u>	<u><i>Media</i></u>
February 7, 1986	10,000 gallon No. 6 oil	200,000 gallon AST	soil
March 6, 1986	750 gallon used oil	WWTP	soil
February 9, 1988	200 gallon diesel	diesel dispenser	asphalt
March 14, 1989	100 gallon hydraulic oil	southwest corner of plant	asphalt
June 23, 1989	oily sheen	stormwater pond	water
September 9, 1989	25-30 gal of fuel oil	south of shipping office	gravel
June 25, 1990	hydraulic oil	truck repair	asphalt
July 16, 1990	50-100 gal of gasoline	southwest corner of manufacturing plant	soil

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July 6, 1993	80-100 gal of diesel fuel	shipping driveway	concrete
July 6, 1994	sulfuric acid	truck repair	asphalt
September 12, 1994	sulfuric acid	truck repair	asphalt
February 23, 1995	20-25 gal of diesel fuel	south of main plant	water
February 28, 1995	30-50 gal of waste oil sludge	WWTP	soil
May 11, 1996	sulfuric acid	WWTP	concrete

- 8. Identify and describe the nature of all past and current operations and production processes at the facility. Identify, if available, all current and previous SIC codes associated with the facility.**

Response to Question #8 was obtained from the Phase I Environmental Site Assessment (CRA, March 1999), and Building Decommissioning Assessment Report (CRA, June 1999).

No Site-specific SIC Code was found.

The Site was operated as agricultural property used for growing various crops prior to development by GM in 1965 for industrial use. GM conducted operations at the Site from 1965 through July 1999. The Site had operated as a metal fabricating facility since its development. Metal fabricating processes operated at the Site included receiving sheet metal; cutting sheet metal; and stamping, grinding, welding, and assembling component parts. Tool and die manufacturing; application of adhesive coatings; wastewater treatment; baling of scrap metal; and storage of raw materials, equipment, waste, and chemicals have also occurred at the Site.

Special processes and equipment used at the Site included equipment historically used to handle scrap metal generated at the Site. No other special processes or equipment (degreasing using chlorinated solvents, plating, etc.) have been operated at the Site. Equipment used to handle scrap metal generated from the fabrication of metal parts included a conveyor system, a clip press, and four balers. The conveyor moved the scrap metal through the Site and to the baler house. The baler house provides the main plant with compressed air for press operations and with steam for building heat and fabrication processes. The clip press and baler were located in the baler house and were used to load the scrap metal into rail cars for shipment off Site.

The conveyor system moved scrap metal throughout the press area of the main manufacturing building through trenches in the basement. The sumps and trenches, which the main conveyors run through, contained oil. The foundation drainage system

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collected groundwater from beneath the building foundations of the large press pit and discharged to the wastewater treatment plant (WWTP) and eventually to the Stormwater Retention Pond.

The conveyor also moved the scrap metal to the baler house through an outdoor overhead conveyor. Four scrap metal balers were historically operated in the baler house. One clip press replaced the four balers to process the scrap metal. One baler remained in the baler house as a backup for the clip press.

The Site operated a WWTP to treat industrial wastewater generated at the Site, prior to discharge to the City of Kalamazoo. The WWTP consisted of a rotosonic pump (to remove large sediment), oil water separator, and then treatment with sulfuric acid, as necessary, to reduce the oil concentration in the wastewater to below 50 parts per million (ppm). The WWTP treated approximately 40,000 to 90,000 gallons per day (gpd) of oily wastewater.

Additionally, the WWTP processed approximately 9,000 to 40,000 gpd of groundwater from the foundation drainage system. The foundation drainage system removed groundwater from below the main manufacturing building to prevent groundwater infiltration into the basement. The groundwater was pumped into a 120,000-gallon tank and continuously discharged to the stormwater retention pond. The groundwater was sampled and visually inspected daily. If the sample indicated a presence of oil above 1 ppm or a visible sheen was observed on the holding tank at the WWTP, then the groundwater was treated and released to the City of Kalamazoo sanitary sewer system. The WWTP also operated a 1,000-gallon AST containing sulfuric acid and a secondary sump for the AST.

The Site also operated one paint booth. The paint booth was used for maintenance painting of equipment used on Site. The paint booth was located in the southwest corner of the main manufacturing building.

9. Identify each product produced at the facility. Further identify the mass quantity of each product produced on an annual basis.

Response to Question #9 was obtained from the ACM Survey Report, (CRA, June 1999).

The plant fabricated parts including metal doors, side panels, and hoods for the Buick, Oldsmobile, Cadillac (BOC) Group. The mass quantities of the products are unknown.

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10. Identify and describe any and all activities or efforts to take production facilities out of operation, and include the dates of each such activity or effort.

Response to Question #10 was obtained from the Building Decommissioning Assessment Report (CRA, June 1999).

A full building decommissioning was performed before the facility was sold to 5200 East Cork Street Investors, LLC. The decommissioning activities performed are addressed in the Building Decommissioning Activities Report prepared by CRA. In general, the following decommissioning activities were performed:

- aboveground storage tank (AST) cleaning;
- conveyor system decommissioning;
- process waste line cleaning;
- product supply line evacuation;
- concrete surface cleaning (pips, trenches, sumps, floors);
- ductwork cleaning;
- wastewater treatment plant decommissioning;
- flaking lead paint abatement in areas routinely accessible;
- kitchen cleaning; and
- waste management and disposal.

Building decommissioning activities began on Tuesday July 6, 1999 and concluded on Tuesday September 14, 1999.

11. Identify and provide any data, estimates, analyses or other information regarding any material used in the production processes at the facility that contained or may have contained PCBs. To the extent available, provide all such data, estimates, analyses or other information on an annual basis.

No material used in production process at the facility contained PCBs.

12. Identify any data, estimates, analyses or other information regarding the concentration of PCBs in any material used in the production processes at the facility. To the extent available, provide all such data, estimates, analyses or other information on an annual basis.

Refer to Response #11.

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13. To the extent not already provided in response to Request #11, provide the following information:

- (a) the type and quantity, on an annual basis, of any oils or other lubricants used at the facility that are known or suspected to have contained PCBs;**
- (b) the number, handling and disposition of all transformers and conductors at the facility; and**
- (c) data, analysis and other information regarding leaks, discharges or other releases from any transformer, conductor or other equipment using oils or lubricants at the facility.**

Response to Question #13 was obtained from the Phase I Environmental Site Assessment (CRA, March 1999) and Building Decommissioning Assessment Report (CRA, June 1999).

- (a) In April 1989, 196 samples of oil from various pieces of equipment throughout the Site were collected by Swanson Environmental and analyzed for PCBs. No PCBs were detected. In 1995, CRA collected oil samples from various pieces of equipment, which were analyzed for PCBs. No concentrations were observed above the laboratory detection limits. The data are presented in Table 4.7 of Attachment B.
- (b) No PCB containing transformers have been operated at the Site. During GM's ownership of the Site, twenty transformers existed at the Site, and all twenty transformers were "dry type" transformers containing gas. For example, in some cases Freon was used.

A large transformer substation owned by Consumers Power Company existed in the northeast corner of the Site. PCB content of these transformers is not known; however, they were not labeled as PCB containing. No staining or leakage was observed during the Site inspection performed during the Phase I ESA. Any closure requirements of the transformers and substation, and impacts to the Site from these transformers would be the responsibility of the owner of the transformers, Consumers Power Company.

Some Site equipment contained PCB capacitors. While the plant was operating, the majority of PCB containing regulated capacitors (> 3 lbs.) were removed and disposed off Site. Two 55-gallon drums of PCB capacitors were disposed off Site in 1986. In 1988, 151 banks of capacitors, or a total of 441 capacitors, were also disposed off Site.

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Site personnel, at the time of the Phase I ESA (CRA, March 1999) indicated that additional PCB-containing capacitors may have been present on cranes and other equipment at the Site; however they had not been inventoried or inspected. CRA did not observe any PCB capacitors during the Site inspection performed as part of the Phase I ESA, nor were any observed during building decommissioning activities performed prior to GM's sale of the facility.

Numerous fluorescent light ballasts were observed at the Site. Historically certain older light ballasts have contained PCBs in the potting fluid. PCB-containing light ballasts were all removed from the Site in the late 1980's, with the exception of light ballasts in the tool room area. At the time of the Building Decommissioning Assessment, the remaining PCB fluorescent light ballasts located within the tool room area were not leaking and consequently remained in operation, since they are not regulated under TSCA unless they are leaking.

- (c) No information on releases from any transformer, conductor, or other equipment using oils or lubricants could be found.

- 14. To the extent not already provided in response to Request #12, identify any data, estimates, analyses or other information regarding the concentration of PCBs in the materials identified in your response to Request #13.**

Refer to Response #13.

- 15. Describe the procedures used by you or anyone on your behalf to test PCB concentrations in the materials identified in your response to Requests #11 and #13, above. Include in your response test methods and dates.**

Response to Question #15 was obtained from the Phase I Environmental Site Assessment (CRA, March 1999) and Building Decommissioning Assessment Report (CRA, June 1999).

PCBs discussed as part of the Building Decommissioning Report prepared by CRA were analyzed using U.S. EPA Method SW-846 8081. The holding time period for soil and water samples from collection to extraction were 14 days and 7 days, respectively. The holding time from extraction to completion of analysis was 40 days. Sample dates are presented in Table 4.7 of the Report (Refer to Attachment B).

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- 16. Describe the procedures followed by you, or anyone on your behalf, to prevent, mitigate or address the release or threat of release of any material identified in your response to Requests #11 and #13, above.**

Refer to Response #13.

- 17. Provide a figure delineating the groundwater flow direction on your property.**

Response to Question #17 was obtained from the Phase I Environmental Site Assessment (CRA, March 1999).

No figures showing groundwater flow direction could be located. Groundwater generally appears to flow to the south.

- 18. Identify the depth(s) to groundwater at your property.**

Response to Question #18 was obtained from the Phase I Environmental Site Assessment (CRA, March 1999).

Groundwater was identified at a depth of approximately 10 to 15 feet below ground surface (bgs).

- 19. Identify the type and amount of all raw process water sources used in the production processes at the facility. To the extent available, provide such information by month of operation.**

Response to Question #19 was obtained from the Waterflow Diagram (BOC Engineering, April 1992).

Raw water, including that used for processing, was obtained from the City of Kalamazoo. According to a Waterflow Diagram (Refer to Attachment C), prepared by the Environmental Facilities Engineering in April 1992, the plant used 52,202,736 gallons per year.

- 20. Identify and describe all information about the PCB content of the raw process water used in each production process at the facility. To the extent available, provide such information by month of operation.**

No PCBs are suspected to have been in the raw water supplied by the City of Kalamazoo.

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- 21. Identify and describe what type of treatment, if any, was used to treat raw process water prior to its use in each production process at the facility.**

No pre-treatment of process water was performed (Refer to Attachment C).

- 22. For each production process at the facility, identify and describe each waste stream from its creation to final disposition.**

Response to Question #22 was obtained from the Phase I Environmental Site Assessment (CRA, March 1999) and Waterflow Diagram (BOC Engineering, April 1992).

Industrial process lines at the Site were located both above and below ground surface. Industrial process waste lines transported oily wastewater from the steam room (where dies were cleaned), the conveyor system, and floor drains to the on-Site WWTP, where it was treated prior to discharge to the City of Kalamazoo. The City of Kalamazoo WWTP discharges to the Kalamazoo River.

Solid non-hazardous and industrial wastes generated at the Site included general refuse, floor blocks, various filters, general construction debris, sludge from wastewater treatment, steam clean room, and cooling tower, used oil and grease, and bio-medical waste.

Refer Response #8 for information pertaining to industrial wastewater sent to the WWTP and scrap metal produced. Also, the Waterflow Diagram in Attachment C depicts process wastewater streams.

- 23. Identify any data, estimates, analyses or other information about the presence of PCBs in each waste stream created at the facility. To the extent available, provide such information on an annual basis.**

Response to Question #23 was obtained from the KAR Laboratories, Inc Data (September and October, 1996) and the Building Decommissioning Assessment Report (CRA, June 1999).

Residual materials in trenches, sumps, pits, vaults, on floor surfaces, and in industrial waste process lines and equipment were sampled to determine contaminant levels used for comparison to relevant criteria that were developed. Residual materials included:

- Dust and filters;

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- Sediment;
- Sludge and oil; and
- Wastewater.

Analytical results for dust and filter samples are presented in Table 4.5 of Attachment B (CRA, June 1999). A total of 11 dust and filter samples were collected. As presented in Table 4.5, no exceedances of PCB criteria were identified in any of the 11 samples.

Analytical results for sediment samples are presented in Table 4.6 of Attachment B (CRA, June 1999). Sediment generally included solid residuals accumulated in pits, sumps, or trenches and process waste lines. A total of five samples were collected. As presented in Table 4.6, no exceedances of PCB criteria were observed.

Analytical results for sludge and oil samples are presented in Table 4.7 of Attachment B (CRA, June 1999). Sludge samples included oily residuals with high moisture contents, which were accumulated on floor surfaces and in pits, sumps, or trenches. Eighteen sludge and oil samples were collected for contamination assessment. As presented in Table 4.7, no exceedances of PCB criteria were observed.

Analytical results for liquid (wastewater) samples are presented in Table 4.8 of Attachment B (CRA, June 1999). Wastewater samples included aqueous material contaminated with petroleum products accumulated in pits, sumps, or trenches. As presented in Table 4.8, no exceedances of PCB criteria were observed.

In addition, wastewater generated at the Site was discharged via Outfalls #1 through #4 to the City of Kalamazoo Sanitary Sewer System. Wastewater data from these outfalls collected in September and October 1996, and analyzed by KAR Laboratories, are presented in Attachment D. As presented in the data in Attachment D, no PCBs were detected above the laboratory detection limit in the outfall data.

- 24. Identify any data, estimates, analyses or other information about the concentration of PCBs in each waste stream created at the facility. To the extent available, provide such information on an annual basis.**

Refer to Response #23.

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- 25. Describe the procedures used by you, your predecessor(s), or anyone on behalf of you or a predecessor, to test the PCB concentration in each waste produced at, or at each waste handling process of, the facility. Include in your response test methods, media tested, and dates.**

Response to Question #25 was obtained from the Building Decommissioning Assessment Report (CRA, June 1999).

PCBs in waste stream samples were analyzed using test method SW-846 8081 for waste samples (oils, liquids, and sludge), and SW-846 8082 for solid samples (concrete, wood, etc.). The different waste media tested included filters, dust, sediment, oil, sludge and wastewater. Sample dates are presented in Tables 4.5 through 4.8 in Attachments B.

- 26. Identify each off-Site location at which wastes from the facility that contained or potentially contained PCBs were disposed. Further identify the dates of each such off-Site disposal, and the nature, quantity and PCB concentration of any such wastes.**

Response to Question #26 was obtained from the Phase I Environmental Site Assessment (CRA, March 1999).

Solid industrial wastes were generally disposed at SK Services facilities (formerly USPCI), including Grassy Mountain in Clive, Utah or Lone Mountain in Waynoka, Oklahoma. In 1986, the Site disposed off-Site two 55-gallon drums of PCB capacitors. In 1988, the Site disposed off-Site 151 banks of capacitors, or a total of 441 capacitors.

- 27. Identify and describe in detail each area of the facility used by you or any predecessor for the storage, treatment or disposal of any waste generated at the facility. Include in the description of each area information concerning the nature and volume of the waste(s) stored, treated or disposed there. To the extent available, provide such information on an annual basis.**

Response to Question #27 was obtained from the Phase I Environmental Site Assessment (CRA, March 1999) and the Building Decommissioning Assessment Report (CRA, June 1999).

Solid non-hazardous and industrial wastes were accumulated at satellite accumulation areas throughout the Site and then transferred in 55-gallon drums or small one cubic yard waste boxes to the hazardous waste storage area in the southwest corner of the main manufacturing building. Hazardous waste was accumulated and temporarily stored for less than 90 days in the hazardous waste storage area, located at the southwest corner of the main manufacturing building. The waste storage area had a

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concrete floor and berm. The concrete floor was in good condition, free of any significant cracks, and coated with a sealant.

According to Site personnel and based on information reviewed, the Site generated over 1,000 kg of hazardous waste per month. Hazardous wastes generated included waste codes D001, D003, (torrit filters, ventilation sludge, paint, solvents) D009 (batteries, ignitron tubes), D002 (batteries, sulfuric acid sludge), D007 (paint, safety kleen solution), D018 (paint, sandblast re-circulation), F003, F005 (debris contaminated with solvents). Hazardous wastes were manifested and the manifests were maintained and matched with return copies.

The WWTP was comprised of approximately 1,900 square feet of floor space. The WWTP was constructed of slab-on-grade concrete, structural steel, and sheet metal siding. Several large ASTs were associated with the WWT Building, and include one 140,000-gallon holding tank, three 40,000-gallon batch tanks, and two 5,000-gallon oil sludge tanks.

In addition to the ASTs associated with the WWTP, there were two-5,000 gallon waste oil ASTs also located at the Site.

According to Site personnel, used pyro-guard oil from the balers was historically applied to the railroad tracks south of the baler house. Approximately 50 to 100 gallons per week was used to control vegetation growth along the railroad for several years while the balers were in operation in the baler house.

According to Site personnel, construction debris including concrete and wood floor blocks were disposed in the wetlands area southeast of the main manufacturing building. Concrete debris was observed in this area during the Site inspection. The filling activities occurred for several years, according to Site personnel, and based on a review of aerial photographs filling activities occurred from around 1966 to 1983.

According to Site personnel, sludge from the pump house cooling towers and power house compressors was historically discharged in the surface drainage ditch located east of the pump house and WWTP.

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28. For each area of the facility identified in response to Request #27,

- (a) identify the PCB concentration of any wastes stored, treated or disposed there. To the extent available, provide such information by month of operation; and**
- (b) describe the procedures and measures taken by you, or anyone on your behalf, to prevent, mitigate or address the release or threat of release of PCBs or other hazardous materials.**

Response to Question #28 was obtained from GM's SPCC and PIPP (Earth Tech, Inc., December 1995) and the Building Decommissioning Assessment Report (CRA, June 1999).

- (a) No concentrations of PCBS were identified in any of the wastes stored, treated or disposed.
- (b) No releases of PCBs occurred. GM maintained a Spill Prevention Control and Countermeasure (SPCC) Plan and Pollution Incident Prevention Plan (PIPP) to prevent any releases of hazardous materials at the Site. In the event of a release, GM immediately mitigated the release, notified appropriate agencies, and filed appropriate follow-up reports.

29. If any area identified in your response to Request #27 is no longer used by you to store, treat or dispose of wastes, describe in detail the current condition of the area. Further describe and provide data, estimates, analyses or other information regarding:

- (a) measures taken by you, or anyone on your behalf, to treat or dispose of any wastes previously stored, treated and disposed in each such area;**
- (b) any residual wastes remaining in each such area;**
- (c) measures taken by you, or anyone on your behalf, to prevent, mitigate or address the release or threat of release of the wastes previously stored, treated or disposed of in each area.**

Response to Question #29 was obtained from the Building Decommissioning Assessment Report (CRA, June 1999), Supplemental Phase II Environmental Site Investigation (CRA, October 1999), and Interim Soil Response Activities Report (CRA, October 1999).

No areas of the facility are currently owned/used by GM. The property was sold in December 1999.

- (a) All waste present at the hazardous waste storage area were properly manifested and transported to appropriate disposal facilities during decommissioning activities.

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Scale and solid wastes from the WWTP process tanks were removed. Process waste lines associated with the WWTP were cleaned. Liquids and sludge were removed the other waste-containing ASTs.

No measures were taken to treat or dispose waste materials associated with the railway or the fill area, as analytical data indicated that further action was not required.

Impacted materials identified in the drainage ditch were excavated and disposed at appropriate disposal facilities. Approximately eight cubic yards of impacted materials were excavated from the drainage ditch, removed, and disposed off-Site. Excavated materials were placed directly into a roll-off box and transported by Safety-Kleen, Inc. to SK-Lone Mountain disposal facility, as RCRA hazardous waste (D 008).

- (b) No residual wastes remain.
- (c) In addition to removing wastes, the concrete flooring, sumps and floor drains in the hazardous waste storage area of the main manufacturing building were cleaned during decommissioning activities.

Decommissioning of the ASTs was accomplished by emptying the tanks of their contents, removing sludge that had accumulated on the bottom of the tanks with a vacuum truck, and pressure washing the interior surfaces of the tanks to remove scale. Because of the continuing operation of the plant and wastewater treatment plant, the waste oil ASTs were returned to service after removal of waste and cleaning.

Additionally, numerous other decommissioning activities were conducted to prevent future releases. Some of these include:

- cleaning 15,500 lineal feet of process waste piping;
- cleaning 33,22 lineal feet of conveyor were cleaned (grease and metal shavings);
- removing accumulations of grease and waste from spindles in the main manufacturing building;
- cleaning all pits, trenches, and sumps;

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- high-pressure washing all concrete floors; and
- cleaning duct work and exhaust systems.

- 30. Provide a figure drawn approximately to scale depicting any area of the facility used by you or a predecessor to store, treat or dispose of any waste generated at the facility. Include the location of the Kalamazoo River in your figure.**

Response to Question 30 was obtained from the Sewer System Site Map, Environmental Facilities Engineering (October 1989) and the Phase I Environmental Site Assessment (CRA, March 1999)

The areas of the facility used for storage, treatment, or disposal of waste generated at the facility are presented on in Attachment E, Attachment F, and Attachment G).

- 31. For each area of the facility identified in response to Request # 27, identify any data, estimates, analyses or other information regarding the nature and quantity of hazardous substances, including PCBs, released or threatened to be released from each such area. To the greatest extent possible, provide such information on an annual basis.**

No PCBs have been released from the areas identified in Response #27. Refer to Response #7 for a summary of non-PCB related releases.

- 32. For each area of the facility identified in response to Request # 27, identify any data, estimates, analyses or other information regarding the release, or threat of release, of hazardous substances, including PCBs, to the Kalamazoo River or any other area of the Site. To the greatest extent possible, provide such information on an annual basis.**

Refer to Responses #7 and #31.

- 33. Identify any data, estimates, analyses or other information about the history of flooding from the Kalamazoo River at the facility. Further, identify any data, estimates, analyses or other information about any infiltration of water, or threat of infiltration of water, from the Kalamazoo River into the areas identified in your response to Request # 27.**

There are no data to suggest flooding of the Site from the Kalamazoo River.

- 34. To the extent not provided in your response to Request #22, describe each wastewater stream, waste oil stream, and wastewater/waste oil mixture stream at the facility, from its creation in the production process to final discharge point. In your response include a complete description of the fate of any wastewater stream, waste oil stream, and wastewater/waste oil mixture stream produced at the facility (e.g. on-site**

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treatment, discharge to a POTW, discharge to a storm sewer outfall, direct discharge to the Kalamazoo River).

Refer to Response #8, #22, and Attachment C.

35. To the extent not provided in response to Requests #22 and #34, identify the amount of all (a) wastewater, (b) waste oil, and (c) wastewater/waste oil mixture produced, on a monthly basis, from each production process at the facility.

Refer to Response #8 and Attachment C.

36. To the extent not provided in response to Requests #23 and #24, identify any data, estimates, analyses or other information about the presence and/or concentration of PCBs in the wastewater, waste oil and wastewater/waste oil mixture produced from each production process at the facility. To the extent available, provide such information on a monthly basis.

Refer to Response #23.

37. Identify any data, estimates, analyses or other information regarding the effectiveness of the treatment system(s) at the facility, if any, to remove PCBs from each wastewater stream, waste oil stream and wastewater/waste oil mixture stream at the facility.

The WWTP had an oil-water separator, but no on-Site facilities were designed to treat PCBs since none were present in the industrial wastewater at the Site.

38. Identify any data, estimates, analyses or other information regarding procedures and measures taken by you, or by anyone on your behalf, to prevent, mitigate or address the release or threat of release of PCBs from wastewater, waste oils, or wastewater/waste oil mixtures to the Kalamazoo River.

As identified in Response #26, any on-Site PCB-containing equipment (capacitors or fluorescent ballasts) was disposed properly in the late 1980s to prevent a release or threat of release.

39. For any POTW identified in response to Request #34, provide on a monthly basis all information regarding the amount of wastewater, waste oil, and wastewater/waste oil mixture discharged to the POTW, the concentration of PCBs in the wastewater, waste oil and wastewater/waste oil mixtures discharged to the POTW from the facility and, to the extent such information is available, the PCB concentration in the effluent from the POTW.

Refer to Response #23, Attachment B and Attachment D. No POTW effluent data were available.

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- 40. Identify each pipe, conduit, storm sewer, sewer line or other outfall that, directly or indirectly, terminates in the Kalamazoo River or its tributaries, past or present, into which treated, untreated or bypassed wastewater, waste oil, or any other waste (including wastewater/waste oil mixtures), from the facility was discharged. Include a figure identifying the source and location of each pipe, conduit, storm sewer, sewer line or other outfall.**

Outfalls #1 to #4 were connected to the City of Kalamazoo Sanitary Sewer System. Outfall #5 associated with on-Site stormwater retention pond discharges to Davis Creek (Refer to Attachment C).

- 41. For each pipe, conduit, storm sewer, sewer line or other outfall identified in your response to Request #40, identify dates of use and each outfall's source at the facility. Further provide, on a monthly basis, the volume of wastewater, waste oil or other waste (including wastewater/waste oil mixtures) discharged from the facility into each pipe, conduit, storm sewer, sewer line or other outfall.**

The dates of use are unknown. Refer to Attachment C.

- 42. For each pipe, conduit, storm sewer, sewer line or other outfall identified in response to Request #40, identify all influent and effluent quality data. Include, to the extent such information is available, the PCB concentration of all influent and effluent, on a monthly basis.**

Response to Question #42 was obtained from the Building Decommissioning Assessment Report (CRA, June 1999), Supplemental Phase II Environmental Site Investigation (CRA, October 1999), Martin Environmental Inc. Data (September 1999), and Draft Baseline Environmental Assessment, IT, December 1999.

Refer to Response #23, Attachment B, Attachment D, Attachment H, and Attachment I.

Four soil and groundwater samples were collected in the vicinity of the Stormwater Retention Pond. The groundwater samples collected were analyzed for phenanthrene, chromium, and lead. A statistical analysis was performed for lead for the Stormwater Retention Pond. Based on the statistical analysis and all applicable criteria identified, no exceedances above applicable residential and industrial groundwater criteria were identified at the Stormwater Retention Pond.

- 43. For each pipe, conduit, storm sewer, sewer line or other outfall identified in response to Request #40, identify all bypasses or spills into the Kalamazoo River or its tributaries.**

Refer to Question #7.

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- 44. Identify any data, estimates, analyses or other information regarding the mass quantity of PCBs disposed into the Kalamazoo River as a result of wastewater, waste oil or wastewater/waste oil discharges from the production processes at the facility. To the extent available, provide such information on an annual basis.**

Refer to Response #23.

- 45. Identify any data, analyses or other information regarding the nature and quantity of hazardous substances, including PCBs, in the sediments, soil, groundwater and surface water at the facility. Identify the concentration levels of PCBs for all samples collected at the facility or at any property abutting the facility.**

Response to Question #45 was obtained from the Building Decommissioning Assessment Report (CRA, June 1999), Phase II Site Investigation (CRA, June 1999), Supplemental Phase II Environmental Site Investigation (CRA, October 1999) the Interim Soil Response Activities Report (CRA, October 1999, Martin Environmental Inc. Data (September 1999), and Draft Baseline Environmental Assessment, IT, December 1999.

Refer to Attachment B, Attachment F, Attachment H, and Attachment I.

- 46. Provide information regarding any environmental response activities involving or potentially involving PCBs or PCB-containing materials conducted at the facility, or on the Kalamazoo River, its tributaries, or other abutting property, at your direction or under your control. Indicate the date(s) on which such response activity was performed, what work was performed, the expenses incurred, the results of the response activity and, if it has not concluded, when the environmental response is expected to conclude.**

No response activities have been performed due to the presence of PCBs.

- 47. Identify all persons who you believe may have knowledge or information about the generation, transportation, treatment, disposal, release or other handling of waste materials, including hazardous substances, at the facility.**

Refer to Response #3.

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- 48. Have you incurred any costs associated with the investigation, remediation or other action to address contamination at the Site or any portion thereof? If yes, identify all costs incurred by you through the date of this Information Request.**

Response to #48 provided by Linda L. Bentley, Legal Assistant, General Motors Corporation.

Yes, costs have been incurred for the investigation, remediation and decommissioning of the facility prior to sale. GM does not believe cost information is relevant to the Site that is the subject of these Requests for Information.

- 49. Identify any data, estimates, analyses or other information regarding the relative contributions of PCBs to Lake Allegan by "facilities," as that term is defined in CERCLA.**

There is no information or data of any kind that indicates that there has been contribution of any on-Site materials to Lake Allegan.

Response dated September 26, 2003